

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>DOLORES (DEE) BARRETT</b>	:	
	:	
<b>V.</b>	:	<b>CIVIL ACTION - LAW</b>
	:	
<b>THE GREATER HATBORO CHAMBER OF COMMERCE, INC.; JOHN J.(BUD) AIKEN, AND MICKEY GLANTZ</b>	:	<b>NO. 02 -cv-4421 JURY TRIAL DEMANDED</b>

**PLAINTIFF'S UNOPPOSED MOTION FOR TRIAL DATE**

AND NOW, this      day of June 2005, comes Plaintiff Dolores Barrett, and respectfully requests that a Trial Date be set in this case for the following reasons:

1. This action for sexual harassment and employment discrimination was filed in July 2002 and has been pending before this Honorable Court nearly three years.
2. Scheduling Order of January 16, 2004 (Ex. A hereto) scheduled this case to be placed on the Court's trial list November 1, 2004. Discovery cutoff was May 17, 2004 and summary judgment motion was to be filed and answered by July 30, 2004.
3. By Order dated December 14, 2004 (Ex. B hereto) summary judgment motion and response was scheduled by January 24, 2005 and the case was to be placed on the Court's trial list for Monday, March 21, 2005.
4. On February 15 and 18, 2005 Notices (Ex. C hereto) placing this case on the Court's trial list on April 4, 2004, and June 6, 2005 were issued. Oral argument on summary judgment was rescheduled for April 20, 2005 and subsequently cancelled. The motion remains pending.
5. In May, 2005 undersigned counsel was verbally advised that the Court's trial date of June 6, 2005 had to be cancelled and trial would be rescheduled in September 2005.

6. No Order for a new trial listing date has been received. Plaintiff believes that further delay will result in undue prejudice. Plaintiff respectfully requests a date certain for trial in order that out of state witnesses can plan to travel here to testify at trial.

7. Prior to filing this Motion, undersigned counsel contacted defense counsel, who advised he concurs in this motion and does not oppose it, as long as trial is not scheduled earlier than September 2005.

WHEREFORE, Plaintiff respectfully requests that a date certain be scheduled for trial of this case without further delay.

Respectfully submitted,

AFA2128

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Anita F. Alberts Esquire  
Counsel for Plaintiff Dolores Barrett  
The Atrium Suite 2 West  
301 South Main Street  
Doylestown PA 18901  
(215) 340-0700  
FAX (215) 340-2747

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**CERTIFICATION OF SERVICE**

ANITA F. ALBERTS ESQUIRE hereby certifies that a true and correct copy of Plaintiff's  
Unopposed Motion for Trial Date was served to counsel for defendants at the address below by  
First Class Mail, on the date written below.

Sidney L. Gold Esquire  
Sidney L. Gold Associates  
Eleven Penn Center  
1835 Market St. Suite 515  
Philadelphia PA 19103

AFA2128

\_\_\_\_\_(date)

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Anita F. Alberts Esquire